

Appl. No. 09/837,004  
Amtd. Dated December 1, 2003  
Reply to Office Action of October 6, 2003

Attorney Docket No. 81846.0026  
Customer No.: 26021

### REMARKS/ARGUMENTS

This application has been carefully reviewed in light of the Office Action dated October 6, 2003. Claims 8-15 remain in this application. Claim 8 is the independent Claim. Claim 8 has been amended. It is believed that no new matter is involved in the amendments or arguments presented herein. Reconsideration and entrance of the amendment in the application are respectfully requested.

#### Art-Based Rejections

Claims 8 and 9 were rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 4,370,356 (Bok); Claims 10, 11 and 13 were rejected under 35 U.S.C. § 103(a) over Bok and in further view of U.S. Patent No. 4,017,982 (Goffredo); Claim 12 was rejected under § 103(a) over Bok and in further view of U.S. Patent No. 6,406,541 (Cairncross); Claim 14 was rejected under § 103(a) over Bok and in further view of U.S. Patent No. 5,796,952 (Komino); Claim 15 was rejected under § 103(a) over Bok and in further view of Japanese Patent 02-019470 A (Fujioka).

Applicant respectfully traverses the rejections and submits that the claims herein are patentable in light of the clarifying amendments above and the arguments below.

#### The Bok Reference

Bok is directed to a method of uniformly disposing a micro thin layer of fluid upon the surface of an object. (*See, Bok, abstract; Col. 1, lines 40-41*). According to Bok, a system, including an infrared heating panel 94, including a hood 52 with system exhaust 54 for venting, is employed to dry the coating material. (*See, Bok, Col. 3, lines 35-38; Fig. 6*). This results in drying through a controlled gaseous flow process. (*See, Bok, Col. 3, lines 60-63*).

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### **The Goffredo Reference**

The ancillary Goffredo reference is directed to an apparatus for drying articles treated with a treatment fluid with cool air. (*See, Goffredo, abstract; Col. 1, line 53*).

### **The Cairncross Reference**

The ancillary Cairncross reference is directed to methods and apparatus for adhering particles on tacky areas on a surface containing an array of tacky and non-tacky areas. (*See, Cairncross, abstract; Col. 1, lines 38-41*).

### **The Komino Reference**

The ancillary Komino reference is directed to reduced and normal pressure treatment unit for reduced and normal pressure treatment of treating objects. (*See, Komino, abstract; Col. 3, lines 13-15*).

### **The Fujioka Reference**

The ancillary Fujioka reference is directed to formation of deposit film having good efficiency by activating raw material gas containing H with plasma of inert gas. (*See, Fujioka, abstract*).

### **The Claims are Patentable Over the Cited References**

The present application is generally directed to an apparatus for manufacturing a semiconductor device by forming a thin film on a substrate.

As defined by amended independent Claim 8, an apparatus for manufacturing a semiconductor device having a thin film on a substrate, includes a washing section for washing the substrate with a washing liquid. A liquid-

removing removes the washing liquid from the substrate by blowing pre-heated compressed air to the substrate washed. A film-forming section is provided for forming a thin film on the substrate from which the washing liquid has been removed.

The applied art of the record is not seen to disclose or suggest the claimed features of the present invention. In particular, the cited reference is not seen to disclose or suggest “a liquid-removing section for removing the washing liquid from the substrate by blowing pre-heated compressed air to the substrate washed,” as required by the claims of the present invention.

Bok, cited by the Office Action, discloses a method of uniformly disposing a micro thin layer of fluid upon the surface of an object. (*See, Bok, abstract; Col. 1, lines 40-41*). According to Bok, a system, including an infrared heating panel 94, including a hood 52 with system exhaust 54 for venting, is employed to dry the coating material. (*See, Bok, Col. 3, lines 35-38; Fig. 6*). This results in drying through a controlled gaseous flow process. (*See, Bok, Col. 3, lines 60-63*). Therefore, the system disclosed by Bok is a traditional oven that uses circulated heated air to dry the substrate. In contrast, present invention the substrate is dried by “blowing pre-heated compressed air to the substrate.” This results in fewer particles attaching to the substrate and consequently lessens the likelihood of defects developing in the thin film formed on the substrate, compared to that of the prior art. (*See Application, Page 2, lines 15-20; Page 3, lines 10-11*).

The remaining ancillary references are not seen to remedy the above deficiencies of Bok. In particular, the remaining references are not seen to disclose or suggest “a liquid-removing section for removing the washing liquid from the

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substrate by blowing pre-heated compressed air to the substrate washed," as required by the claims of the present invention.

Since the cited references fails to disclose, teach or suggest the above features recited in amended independent Claims 8, these references cannot be said to anticipate or render obvious the invention which is the subject matter of that claim. Accordingly, amended independent Claim 8 is believed to be in condition for allowance and such allowance is respectfully requested.

The remaining claims depend either directly or indirectly from amended independent Claim 8 and recite additional features of the invention which are neither disclosed nor fairly suggested by the applied references and are therefore also believed to be in condition for allowance.

### **Conclusion**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 337-6809 to discuss the steps necessary for placing the application in condition for allowance.

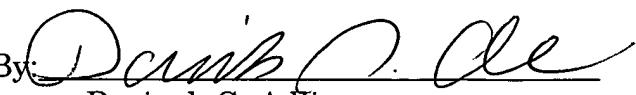
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If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,  
HOGAN & HARTSON L.L.P.

Date: December 1, 2003

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